

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO**

DIANE OWENS, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

FIRSTENERGY CORP., CHARLES E. JONES,  
JAMES F. PEARSON, STEVEN E. STRAH and  
K. JON TAYLOR,

Defendants.

Civil Action No. 2:20-cv-03785-ALM-KAJ

CHANA FRAND, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

FIRSTENERGY CORP., CHARLES E. JONES,  
JAMES F. PEARSON, STEVEN E. STRAH and  
K. JON TAYLOR,

Defendants.

Civil Action No. 2:20-cv-04287-JLG-EPD

**JAMES J. DURRETT JR.'S MOTION FOR CONSOLIDATION OF THE ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF  
SELECTION OF COUNSEL**

Proposed lead plaintiff James J. Durrett Jr. ("Movant") hereby move this Court for an order: (1) consolidating the above captioned actions (the "Actions"); (2) appointing Movant as Lead Plaintiff in the Actions pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4; (3) approving Movant's selection of Levi & Korsinsky, LLP as Lead Counsel and Cummins Law LLC as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Movant submits herewith a Memorandum of Law, the Declaration of James R. Cummins, and a proposed Order.

DATED: September 28, 2020

**CUMMINS LAW LLC**

/s/ James R. Cummins

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*Attorneys for Movant and Proposed Lead Counsel  
for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 28, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys on record.

/s/ James R. Cummins  
James R. Cummins